

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

CRISPIN VACA

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§
§

CRIMINAL NO.

19 CR 779

United States Courts
Southern District of Texas
FILED

OCT 23 2019

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Engaging in the Business without a License - Firearms)

From on or about October 2017 to May 2019, in the Southern District of Texas,
Defendant,

CRISPIN VACA,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

(Exportation of Firearms)

From on or about October 2017 to May 2019, in the Southern District of Texas,
Defendant,

CRISPIN VACA,

facilitated the transportation of articles and objects designated as munitions on the United States Munitions List, that is:

- (i) approximately thirty-two . 9 mm pistols; and
- (ii) approximately two (2) .380 caliber pistols; and

- (iii) approximately five (5) .40 caliber pistols; and
- (iv) approximately ten (10) .22 caliber pistols

prior to exportation, knowing said firearms to be intended for exportation from the United States and into Mexico, : contrary to Title 22, Code of Federal Regulations, Sections 121.1, 123.1 and 127.1, a law or regulation of the United States.

In violation of Title 18, United States Code, Section 554.

COUNT THREE
(False Statement During Purchase of a Firearm)

On or about February 18, 2018, in the Southern District of Texas, Defendant,

CRISPIN VACA,

in connection with the acquisition of a firearm, that is, a Smith & Wesson Model SD9VE 9 mm pistol, from Academy Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Academy Sports, which statement was intended and likely to deceive Academy Sports, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearm, whereas in truth and in fact, he was acquiring the firearm on behalf of another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

RYAN K. PARTICK
UNITED STATES ATTORNEY


CARRIE WIRSING
Assistant United States Attorney